

Message

---

**From:** STURDEVANT Debra [Debra.STURDEVANT@state.or.us]  
**Sent:** 3/7/2019 7:44:08 PM  
**To:** Labiosa, Rochelle [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ded3654216c9461d95cd5a3ceec507ef-Labiosa, Rochelle]  
**Subject:** RE: EPA comments and finding a time for a call RE: Draft mercury variance document for the Rock Creek AWWTF

Ok, Thanks Rochelle

---

**From:** Labiosa, Rochelle <labiosa.rochelle@epa.gov>  
**Sent:** Thursday, March 07, 2019 11:43 AM  
**To:** STURDEVANT Debra <Debra.STURDEVANT@state.or.us>; BOROK Aron <Aron.BOROK@state.or.us>; DOU Connie <Connie.Dou@state.or.us>; Guzzo, Lindsay <Guzzo.Lindsay@epa.gov>  
**Cc:** BRANDSTETTER Erich <Erich.Brandstetter@state.or.us>; HYNSON Mark <Mark.Hynson@state.or.us>; Fleisig, Erica <Fleisig.Erica@epa.gov>  
**Subject:** RE: EPA comments and finding a time for a call RE: Draft mercury variance document for the Rock Creek AWWTF

Thanks Debra- for interim questions, Erica Fleisig, cc'd here is the best point of contact.

Please let us know if there are any questions or clarifications needed prior to 3/29.

All the best,  
Rochelle  
Rochelle Labiosa, Ph.D.  
Office of Water and Watersheds  
US EPA, Region 10  
1200 Sixth Avenue, Suite 155, MC: OWW-191  
Seattle, WA 98101-3140  
Ph: 206.553.1172

---

**From:** STURDEVANT Debra <Debra.STURDEVANT@state.or.us>  
**Sent:** Thursday, March 07, 2019 11:04 AM  
**To:** Labiosa, Rochelle <labiosa.rochelle@epa.gov>; STURDEVANT Debra <Debra.STURDEVANT@state.or.us>; BOROK Aron <Aron.BOROK@state.or.us>; DOU Connie <Connie.Dou@state.or.us>; Guzzo, Lindsay <Guzzo.Lindsay@epa.gov>  
**Cc:** STURDEVANT Debra <Debra.STURDEVANT@state.or.us>; BRANDSTETTER Erich <Erich.Brandstetter@state.or.us>; HYNSON Mark <Mark.Hynson@state.or.us>  
**Subject:** RE: EPA comments and finding a time for a call RE: Draft mercury variance document for the Rock Creek AWWTF

Rochelle, I am supposed to be off March 29, but let's schedule a call on the 29<sup>th</sup> and I'll adjust my schedule. April 8 is just too far out. Even March 29 stretches this process out longer than our schedule allows and will require us to again delay our public comment date for the variance and the CWS modified permit.

**Ex. 6 Personal Privacy (PP)**

**Ex. 6 Personal Privacy (PP)**

Please let me know who the primary reviewers were? That way I can contact them directly if I have specific questions so we can make progress. It is probably not necessary to wait until we can get everyone on the phone at the same time to at least ask clarifying questions and to get an idea of what/how much additional information is needed to respond to some of the comments.

If you are not sure, I would probably start with Monjoli, does that sound right?

Thank you,  
Debra

---

**From:** Labiosa, Rochelle <[labiosa.rochelle@epa.gov](mailto:labiosa.rochelle@epa.gov)>

**Sent:** Wednesday, March 06, 2019 10:14 AM

**To:** STURDEVANT Debra <[Debra.STURDEVANT@state.or.us](mailto:Debra.STURDEVANT@state.or.us)>; BOROK Aron <[Aron.BOROK@state.or.us](mailto:Aron.BOROK@state.or.us)>; DOU Connie <[Connie.Dou@state.or.us](mailto:Connie.Dou@state.or.us)>; Guzzo, Lindsay <[Guzzo.Lindsay@epa.gov](mailto:Guzzo.Lindsay@epa.gov)>

**Cc:** BRANDSTETTER Erich <[Erich.Brandstetter@state.or.us](mailto:Erich.Brandstetter@state.or.us)>; HYNSON Mark <[Mark.Hynson@state.or.us](mailto:Mark.Hynson@state.or.us)>

**Subject:** RE: EPA comments and finding a time for a call RE: Draft mercury variance document for the Rock Creek AWWTF

Hi Debra,

I looked at schedules, and unfortunately key people wouldn't be able to attend on those dates in the AM (Lindsay had checked before she left, but I re-checked to see if anything had changed). So 3/29 is first available with the group.

I hope that date and time works for you and others at ODEQ. If not, the first available after that is 4/8, 9-10:30, and I can check other dates if needed.

Thanks,  
Rochelle

Rochelle Labiosa, Ph.D.  
Office of Water and Watersheds  
US EPA, Region 10  
1200 Sixth Avenue, Suite 155, MC: OWW-191  
Seattle, WA 98101-3140  
Ph: 206.553.1172

---

**From:** STURDEVANT Debra <[Debra.STURDEVANT@state.or.us](mailto:Debra.STURDEVANT@state.or.us)>

**Sent:** Tuesday, March 05, 2019 6:22 PM

**To:** BOROK Aron <[Aron.BOROK@state.or.us](mailto:Aron.BOROK@state.or.us)>; DOU Connie <[Connie.Dou@state.or.us](mailto:Connie.Dou@state.or.us)>; Guzzo, Lindsay <[Guzzo.Lindsay@epa.gov](mailto:Guzzo.Lindsay@epa.gov)>; Labiosa, Rochelle <[labiosa.rochelle@epa.gov](mailto:labiosa.rochelle@epa.gov)>

**Cc:** STURDEVANT Debra <[Debra.STURDEVANT@state.or.us](mailto:Debra.STURDEVANT@state.or.us)>; BRANDSTETTER Erich <[Erich.Brandstetter@state.or.us](mailto:Erich.Brandstetter@state.or.us)>; HYNSON Mark <[Mark.Hynson@state.or.us](mailto:Mark.Hynson@state.or.us)>

**Subject:** FW: EPA comments and finding a time for a call RE: Draft mercury variance document for the Rock Creek AWWTF

Rochelle,

Thanks so much for sending these comments on the Rock Cr. document.

When we spoke with Lindsay last week, we discussed setting up 2 meetings. The first call was to be with HQ about the comments so we can ask questions and make progress responding. My notes say we were going to target March 11-22 for that call.

We are available March 18, 19 or 20 in the morning. Can you see if the HQ folks are available at that time so we keep this project moving?

I think the March 29 date Lindsay gave you was to meet with her when she's back. I actually can't meet on the 29<sup>th</sup>, but Aron and I both have a lot of time open on April 2 and 3.

Thank you,  
Debra

---

**From:** Labiosa, Rochelle <[labiosa.rochelle@epa.gov](mailto:labiosa.rochelle@epa.gov)>  
**Sent:** Tuesday, March 05, 2019 4:41 PM  
**To:** STURDEVANT Debra <[Debra.STURDEVANT@state.or.us](mailto:Debra.STURDEVANT@state.or.us)>  
**Cc:** Guzzo, Lindsay <[Guzzo.Lindsay@epa.gov](mailto:Guzzo.Lindsay@epa.gov)>  
**Subject:** EPA comments and finding a time for a call RE: Draft mercury variance document for the Rock Creek AWWTF

Hi Debra,

Since Lindsay is out, I am sending you the attached EPA comments on the draft Rock Creek mercury variance. In looking at calendars, Lindsay identified 3/29, 11AM-1PM PT as a possible time for a call to discuss the comments, if needed. Can you let me know if that time would work for you and others at ODEQ, or if not, can you send me dates and times the following week(s) that would work for you?

All the best,  
Rochelle

Rochelle Labiosa, Ph.D.  
Office of Water and Watersheds  
US EPA, Region 10  
1200 Sixth Avenue, Suite 155, MC: OWW-191  
Seattle, WA 98101-3140  
Ph: 206.553.1172

---

**From:** STURDEVANT Debra <[Debra.STURDEVANT@state.or.us](mailto:Debra.STURDEVANT@state.or.us)>  
**Sent:** Monday, February 04, 2019 2:29 PM  
**To:** Guzzo, Lindsay <[Guzzo.Lindsay@epa.gov](mailto:Guzzo.Lindsay@epa.gov)>; Labiosa, Rochelle <[labiosa.rochelle@epa.gov](mailto:labiosa.rochelle@epa.gov)>; 'Rajeev Kapur' <[KapurR@CleanWaterServices.org](mailto:KapurR@CleanWaterServices.org)>; 'Bob Baumgartner' <[BaumgartnerB@CleanWaterServices.org](mailto:BaumgartnerB@CleanWaterServices.org)>  
**Cc:** Alex Liverman <[alex.liverman@state.or.us](mailto:alex.liverman@state.or.us)>; BOROK Aron <[Aron.BOROK@state.or.us](mailto:Aron.BOROK@state.or.us)>; DOU Connie <[Connie.Dou@state.or.us](mailto:Connie.Dou@state.or.us)>; STURDEVANT Debra <[Debra.STURDEVANT@state.or.us](mailto:Debra.STURDEVANT@state.or.us)>; NAVARRO Jeffrey <[Jeffrey.NAVARRO@state.or.us](mailto:Jeffrey.NAVARRO@state.or.us)>; WIGAL Jennifer <[Jennifer.WIGAL@state.or.us](mailto:Jennifer.WIGAL@state.or.us)>; GREEN Justin <[Justin.B.Green@state.or.us](mailto:Justin.B.Green@state.or.us)>; HYNSON Mark <[Mark.Hynson@state.or.us](mailto:Mark.Hynson@state.or.us)>; Shaw, Hanh <[Shaw.Hanh@epa.gov](mailto:Shaw.Hanh@epa.gov)>; BOHABOY Spencer <[Spencer.BOHABOY@state.or.us](mailto:Spencer.BOHABOY@state.or.us)>  
**Subject:** Draft mercury variance document for the Rock Creek AWWTF

Hello Rochelle and Lindsay,

Attached is DEQ's draft variance document for the Rock Creek AWWTF for your review and comment. As you may recall, DEQ sent an initial draft in 2018 and we had discussions with EPA R10 and HQ. I agreed to write a second draft, responding to the comments we could, and EPA was going to discuss some of our questions in order to provide additional guidance. With this draft, DEQ would like to understand more clearly what additional documentation is necessary to support the variance and meet federal regulations. DEQ requests that EPA provide comments back to me on the Rock Creek variance document by the end of February.

DEQ is concerned about the timeline for the four CWS variances because the modified permit for the CWS facilities cannot be completed until all four variances are granted by DEQ and approved by EPA. DEQ plans to go out for public comment on the modified permit and the four variances on May 1, 2019. DEQ is also concerned about ensuring that the variance process is clear and efficient so that variances may be completed in a timely manner in the future.

DEQ is simultaneously working on a multiple discharger variance for mercury for the Willamette Basin, which we plan to take to the Oregon Environmental Quality Commission for adoption in November 2019 or January 2020. The Willamette Mercury MDV is needed in order to complete the Willamette basin permits scheduled for renewal in FY 2021.

Please contact me with any questions or concerns. I realize that EPA is behind on many things due to the long shut down, but we hope that this project can continue to move forward reasonably soon.

Thank you!

Debra

Debra Sturdevant

ODEQ

503-229-6691

[Sturdevant.Debra@deg.state.or.us](mailto:Sturdevant.Debra@deg.state.or.us)

[Water Quality Standards website](#)